

UNITED STATES DISTRICT COURT

for the

Eastern District of North Carolina

United States of America

v.

Robert Michael Glauner

Case No. 5:23-MJ-2430-JG

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 2023 through November 2023 in the county of Wake in the Eastern District of North Carolina and elsewhere, the defendant(s) violated:

Code Section

18 U.S.C. § 2261A(1)(A)(i)

18 U.S.C. §§ 1039(a)(1), (a)(3), and (e)(1)

Offense Description

Stalking

Fraud and related activity in connection with obtaining confidential phone records information of a covered entity

This criminal complaint is based on these facts:

See attached

☒ Continued on the attached sheet.

Complainant's signature

MICHAEL NEYLON, FBI Special Agent

Printed name and title

Attested to by the complainant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone (specify reliable electronic means).Date: 11 DEC. 2023City and state: Raleigh, North Carolina

Judge's signature

JAMES E. GATES, United States Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NORTH CAROLINA**

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Special Agent Michael Neylon, being duly sworn, depose and state that: .

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since February 2020. Prior to that, my assignments and experience include approximately four years of liaison work assigned to the FBI's Criminal Justice Information Services Division (CJIS). I have attended and completed five months of training at the FBI's Training Academy located in Quantico, Virginia. While employed with the FBI, I have investigated and participated in investigations involving federal criminal violations related to drug trafficking and violent crimes. I have also received specialized training regarding, and personally participated in, various types of investigative activities related to violent crimes, including, but not limited to, the following: (a) physical surveillance; (b) the debriefing of defendants, witnesses, informants, and other individuals who have knowledge concerning violations of federal laws; (c) the execution of search warrants; and (d) the handling and maintenance of evidence.

2. I have consulted extensively with other experienced agents regarding drug trafficking and violent criminal cases. As a result, the knowledge that I have obtained during my law enforcement career has been further informed by other law enforcement agents with experience conducting such investigations. I have also

obtained both my Bachelor of Science degree in Forensic Science, and my Master of Science degree in Criminal Justice from Mercyhurst College, located in Erie, Pennsylvania.

3. As a Special Agent with the FBI, I am a law enforcement officer of the United States as defined by 18 U.S.C. § 2510(7), meaning that I am empowered by law to investigate violations of the laws of the United States, execute warrants issued under the authority of the United States, and make arrests for violations of Federal laws.

4. The facts and information contained in this affidavit are based upon my training and experience, personal knowledge, and observations during this investigation, as well as the observations of other agents and investigators involved in this investigation. This affidavit contains only the information necessary to support probable cause, and it is not intended to include each and every fact and matter observed by me or known to the government.

5. I make this affidavit in support of a criminal complaint and arrest warrant for **Robert Michael GLAUNER (GLAUNER)**. Based on the information detailed below, I submit that there is probable cause to believe that, beginning in or around September 2023 and continuing through at least November 2023, **GLAUNER** violated 18 U.S.C. § 2261A(1)(A)(i) (stalking). I also submit that there is probable cause to believe that during the aforementioned timeframe, **GLAUNER** did knowingly and intentionally receive, and attempt to receive, in interstate commerce, confidential phone records information of a covered entity for the telephone number

XXX-XXX-8578, issued to the user with the initials M.G.D. (hereafter "Victim 1"), without prior authorization from the customer to whom such confidential phone records information related, and knowing and having reason to know such information was obtained fraudulently, in violation of 18 U.S.C. §§ 1039(a)(1), (a)(3), and (e)(1).

PROBABLE CAUSE

6. As will be shown below, there is probable cause to believe that **GLAUNER** committed the crime of stalking, in violation of 18 U.S.C. § 2261A(1)(A)(i), and the crime of fraud and related activity in connection with obtaining confidential phone records information of a covered entity, in violation of 18 U.S.C. §§ 1039(a)(1), (a)(3), and (e)(1), which occurred within the Eastern District of North Carolina.

7. Based on my review of law enforcement reports, conversations with other law enforcement officers or agents, witness/victim interviews, and my own knowledge of the investigation, I am aware of the following:

8. Victim 1 is a resident of North Carolina.

9. **GLAUNER** and Victim 1 met each other online, at xhamster.com, an adult online dating website, in or around August or September 2023.

10. **GLAUNER** and Victim 1 at first had an online romantic relationship, this was ended by Victim 1. After the relationship ended, **GLAUNER** continued to contact or try to contact Victim 1.

11. During the investigation into two separate incidents, the following was learned:

12. On September 26, 2023, around 2:18 PM (unknown time zone), the VSAT CCT (Version Security Assistance Team—Court Order Compliance Team), located at 180 Washington Valley Road, Bedminster, NJ 07921, a division of Verizon Wireless (a Covered Entity), received the following message from the email account “steven1966c@proton.me” (hereafter known as SUBJECT EMAIL ACCOUNT #1):

From: steven1966c <steven1966c@proton.me>
Sent: Tuesday, September 26, 2023 2:18 PM
To: VSAT CCT <vsat.cct@one.verizon.com>
Subject: (No Subject)

Here is the pdf file for search warrant. We are in need if the this cell phone data as soon as possible to locate and apprehend this suspect. We also need the full name of this Verizon subscriber and the new phone number that has been assigned to her. Thank you

Sent with Proton Mail secure email.

The document that was referenced read as follows:

IN THE MATTER OF THE SEARCH OF

Case Number CH-27519

Detective Steven Cooper of the Cary, NC police Department who is currently assigned to the Homicide Division, being of lawful age and first duly sworn upon my oath, states as follows.

I am submitting this Affidavit in support of an application for a warrant to search and seize the cellular phone from [Mxx, referring to Victim 1] suspect in this homicide case. Phone number (XXX) XXX 8578

I am a detective with the Cary police department and have been so employed for approximately six years.

During my career as a detective of the Cary police department I have participated in the execution of 8 search warrants.

Because this affidavit is being submitted for the limited purpose of securing a warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the portable device described above is evidence in this Homicide Case.

The Phone Number [(XXX) XXX]-8578 is owned by a female person who was seen at the scene of the homicide. Two eye witnesses describe the female suspect as fleeing the scene moments after the crime occurred. Now my superior office and I believe that a member from our police department is compromised by the suspect. And the sheriffs office may be as well. On Friday the 22nd of September the suspect had the Verizon phone number changed. Since we have looking for this suspect we have been unable to locate her. We are requesting all cell phone data for [(XXX) XXX] 8578 and the new number that was assigned to the suspect from her Verizon account.

Searching the cell phone data for the evidence described above may require a range of data analysis techniques. We ask for all cell phone data to include. Call records both outgoing and incoming. Locations and text messages incoming and outgoing. We need these records going back 90 days to establish then involvement of the suspect [Mxx, referring to Victim 1] and any co suspects who has been in contact with.

Criminals can mislabel or hide files and directories, encode communications to avoid using key words, attempt to delete files to evade detection, or take other steps designed to frustrate law enforcement searches or to flee the are and possibly the country. In light these difficulties, your affiant request permission to use whatever data analysis techniques appear necessary to locate and retrieve the evidence described above. And to locate and apprehend the suspect.

[Signed Steven Cooper] Detective

Sworn to me and described in my presence this 22nd day September 2023

[Signed Gale Adams] Honorable Judge

13. The above-referenced “search warrant” is not in the proper format and does not have form AOC-CR-119, as required for State of North Carolina search warrants. The document mentioned above was signed by a person identifying himself as Officer Steven Cooper of the Cary Police Department in North Carolina. It has been confirmed by the Cary Police Department that no such officer is employed with their agency.

14. The document mentioned above purportedly signed by “Gale Adams.” Gale M. Adams is a Superior Court Judge in Cumberland County, North Carolina, which is likewise located within the Eastern District of North Carolina. On October 18, 2023, Judge Gale M. Adams was shown the document, and she indicated that the signature displayed on the document was not hers.

15. The email address associated with the request is a Proton Mail account, which is not an official government email address. Proton Mail is a private email service provider located in Switzerland and is encrypted to where Proton cannot see the contents of their user’s emails. Based on the above information, detectives with the Raleigh Police Department (RPD) determined the document to be counterfeit and was created with the intent to injure or defraud.

16. On September 26, 2023, at 3:07 PM, VSAT CCT received a phone call from a subject who identified himself as Officer Cooper of the Cary Police Department, utilizing the phone number 843-999-0323 (hereafter the TARGET NUMBER). The caller stated that he sent the PDF version of the search warrant and

was waiting for Verizon's reply. The caller said that he had just received information from a CI (Confidential Informant) that the "suspect" in the homicide case was going to flee to Puerto Rico and requested a rush on delivery of the data. The information being sought was associated with the number "XXX-XXX-8578." The caller stated that the person involved changed her phone number. The caller originally sent his "search warrant" to Verizon Wireless's VSAT.CCT@one.verizon.com address and agreed to resend a copy of the search warrant so the call taker (at Verizon) could find the search warrant.

17. Based on the information provided by Eric Lawson from the VSAT CCT, the phone number mentioned within the fraudulent search warrant above (XXX-XXX-8578) is assigned to the Verizon Wireless subscriber Victim 1.

18. On September 26, 2023, at 3:15 PM (unknown time zone), VSAT CCT received a communication from SUBJECT EMAIL ACCOUNT #1 stating the following:

From: steven1966c steven1966c@proton.me
Sent: Tuesday, September 26, 2023 3:15 PM
To: VSAT CCT <vsat.cct@one.verizon.com>
Subject: search warrant

We need this information non [(XXX) XXX] 8578 and all info on subscribers new number and full name

Sent with Proton Mail secure email.

19. On October 5, 2023, Verizon Wireless provided Victim 1's phone records, including address and phone logs, to GLAUNER.

20. On October 9, 2023, around 3:54 PM (unknown time zone), VSAT CCT received a phone call from a subject who identified himself as Officer Cooper of the Cary Police Department, and the caller was asking how to read the data. Based on the conversation in the recorded call, it was confirmed that **GLAUNER** had obtained the records from Verizon Wireless. The caller indicated that the subscriber had changed phone numbers, and he had obtained the new number.

21. On October 10, 2023, at 1:43 PM (unknown time zone), VSAT CCT received a communication from SUBJECT EMAIL ACCOUNT #1 stating the following:

From: steven1966c <steven1966c@proton.me>
Sent: Tuesday, October 10, 2023 1:43 PM
To: VSAT CCT <vsat.cct@one.verizon.com>
Subject: Search Warrant [XXX XXX] 5456

This search is signed and needs to be executed
Immediately
We believe that the subscriber of this number is
planning on fleeing the country to Puerto Rico soon.

Your cooperation on this matter would be greatly
appreciated.

Thank you,
Detective Steven Cooper

Sent with Proton Mail secure email.

22. This communication contained an attachment that read as follows:

IN THE SUPERIOR COURT, WAKE COUNTY JUDICIAL
DISTRICT COURT COUNTY OF WAKE
SEARCH WARRANT

No, CH _27519

The people of the state of North Carolina, to any sheriff, any constable, marshal, police officer, or any other peace officer in the County of Wake.

Proof by affidavit, having been made this day before me by Detective Steven Cooper employed by the Cary police department, that there is substantial probable cause for the issuance of the search warrant. You are therefore commanded to make search at this time for good cause being shown therefore, the complete cell phone data for Verizon Cellular Number [(XXX) XXX] 5456, including name of subscriber and address of subscriber to this phone number. The data to be collected is for the past three months. All data to include is as follows. All incoming and outgoing calls, all texts messages both incoming and outgoing, GPS coordinates for said number, and all pictures being sent and received. IP address of said number to be collected. Complete cell sites identification numbers.

Given under my hand on this 10th day of October, 2023

[Signed Gale Adams]

Judge of the Superior court
Wake County Judicial District

23. Based on the similar formatting errors, the lack of form AOC-CR-119, the similar affiant "Steven Cooper," and the same judge's forged signature (also reflecting an incorrect county), RPD detectives determined that this document was counterfeit and was created with the intent to injure or defraud.

24. Based on information provided by Eric Lawson from the VSAT CCT, the phone number referred to in the email as mentioned above (XXX-XXX-5456) and listed in the fraudulent "search warrant" was also assigned to subscriber Victim 1.

25. On October 12, 2023, at 4:52 PM (unknown time zone), VSAT CCT received another communication from SUBJECT EMAIL ACCOUNT #1, stating the following:

search warrant [(XXX) XXX] 5456
steven1966c <steven1966c@proton.me> Thu, Oct 12, 2023 at 4:52 PM
To: VSAT CCT vsat.cct@one.verizon.com

This is Detective Steven Cooper with the Cary, NC police Dept
I have submitted a searchvm warrant for Verizon number [(XXX) XXX]
5456 and I have not heard back from your legal department.
Nit even a case number. Now the user of this number is wanted
for a homicide. We believe that this person is getting ready to
flee the US jurisdiction to Puerto Rico. We would like to get the
data on this number as soon as possible please.
Thank you for your cooperation.

Sent with Proton Mail secure email.

26. On October 13, 2023, at 3:24 PM (unknown time zone), VSAT CCT
received a communication from the email account "Tim.K.1972@proton.me"
(hereafter SUBJECT EMAIL ACCOUNT #2), stating the following:

From: Tim.K.1972@proton.me <Tim.K.1972@proton.me>
Sent: Friday, October 13, 2023 3:24 PM
To: VSAT CCT <vsat.cct@one.verizon.com>
Subject: search warrant

Here is the recent search warrant for subscriber number [(XXX) XXX]
8578 we are
in need of this information as soon as possible. We believe that this
homicide
suspect is ready to flee the US to avoid prosecution. We need the new
number
that was described in the warrant to locate this suspect before she fees
the
country.

Thank you for your cooperation

Sent with Proton Mail secure email.

27. On October 13, 2023, at 5:11 PM (unknown time zone), VSAT CCT received a communication from SUBJECT EMAIL ACCOUNT #2, stating the following:

typo error

Tim.K.1972@proton.me <Tim.K.1972@proton.me> Fri, Oct 13, 2023 at 5:11 PM

To: "VSAT.CCT@ONE.Verizon.com" <VSAT.CCT@one.verizon.com>

This is in regards to the pdf file of a search warrant for the Verizon Phone

Number [(XXX) XXX] 8578 it appears that the typo error is in regards to the date

of the new number that was issued to the subscriber. The date should read as

follows. The 22nd of September of 2023.

Sent with Proton Mail secure email.

28. On October 13, 2023, around 3:52 PM , Victim 1's mother (hereafter Victim 2) received a voice message from **GLAUNER** concerning trying to contact Victim 1. Between October 13 and October 22, 2023, Victim 2 received ten different voice messages from **GLAUNER** indicating that he was trying to reach Victim 1 and would not stop until he made contact with Victim 1.

29. On October 15, 2023, at 3:39 PM, a subject identifying himself as "Christopher Mullins" called the Raleigh Wake Emergency Communications Center utilizing the **TARGET NUMBER** and requested a check on welfare for the address of 50 Summit Ave, Raleigh, NC. The following were comments entered by the 911 dispatcher:

[1] COUSIN WAS TALKING ABT HURTING HERSELF SINCE FRIDAY

[2] COUSIN NAME IS [Mxx, referring to Victim 1] [XXXXXX]

[3] Duplicate call appended to incident at 15:42:56
[4] CALLER STATES SHE THREATENED TO TAKE MORPHINE TO
END HER LIFE ON
FRIDAY. HE HAS NOT HEARD FROM HER SINCE THEN AND IS
NOW WORRIED. HE
THOUGHT SHE JUST WANTED ATTENTION...[Mxx, referring to
Victim 1]'S DOB IS [X-XX]-1989. HER PHONE
NUMBER IS [XXX-XXX]-5456 AND SHE IS NOT
ANSWERING. STATES SHE IS
[5] STATES SHE HAS NEVER DONE THIS BEFORE. CALL COMP
WITH RESULTS. SHE DOESN'T HAVE A CAR.

30. RPD Officer W. Conner responded to the call and determined that the
call was false.

31. On October 16, 2023, at 12:37 PM (unknown time zone), VSAT CCT
received a communication from the email account "gallagher.kelley@proton.me"
(hereafter SUBJECT EMAIL ACCOUNT #3), stating the following:

From: gallagher.kelley@proton.me <gallagher.kelley@proton.me>
Sent: Monday, October 16, 2023 12:37 PM
To: VSAT CCT <vsat.cct@one.verizon.com>
Subject: Search Warrant

This is a search warrant for the Verizon subscriber and we need this
information as soon as possible for this subscriber is a suspect in a
homicide case. Thank you for your cooperation.

Sent with Proton Mail secure email.

32. The document that was referenced read as follows:

IN THE SUPERIOR COURT, WAKE COUNTY JUDICIAL
DISTRICT COURT COUNTY OF WAKE

SEARCH WARRANT
No, CH_27519

The people of the state of North Carolina, to any sheriff, any constable,
marshal, police officer, or any other peace officer in the County of
Wake.

Proof by affidavit, having been made this day before me by Kelle Gallagher employed by the White Oak police department, that there is substantial probable cause for the issuance of the search warrant. You are therefore commanded to make search at this time for good cause being shown therefore, the complete cell phone data for Verizon Cellular Subscriber [Mxxxxxxx Dxxxxxx, referring to Victim 1], including name of subscriber and address of subscriber to include all additional lines to this subscriber. To Include the New number than was assigned that was changed from [(XXX) XXX] 8578 on the 22nd Of September of 2023. The data to be collected is for the past three months. All data to include is as follows. All incoming and outgoing calls, all texts messages both incoming and outgoing, GPS coordinates for numbers including all additional line connected to this subscriber, and all pictures being sent and received. IP addresses of all numbers connected to this subscriber to given. Complete cell sites identification numbers.

Given under my hand on this 12th day of October, 2023

[Signed Gale Adams]
Judge of the Superior court
Wake County Judicial District

33. Based on the similar formatting errors, the lack of form AOC-CR-119, the similar wording, the same judge's signature, the use of the Proton Mail email account, and the fact that a White Oak Police Department (in North Carolina) does not exist, it was determined by RPD detectives that this document was counterfeit and was created with the intent to injure or defraud.

34. In addition, the phone number referenced in the fraudulent document (XXX-XXX-8578) appears similar to Victim 1's number but contains a typographical error in one digit. However, the document makes a direct reference to Victim 1 by name within its body.

35. On October 16, 2023, at 7:24 PM, Victim 1's father (hereafter Victim 3) received a text message on his mobile phone from the TARGET NUMBER. The text consisted of a picture of Victim 1 and the message, "Do you know this girl?"

36. On October 17, 2023, at 9:17 AM (unknown time zone), VSAT CCT received a communication from SUBJECT EMAIL ACCOUNT #3 stating the following:

From: gallagher.kelley@proton.me <gallagher.kelley@proton.me>
Sent: Tuesday, October 17, 2023 9:17 AM
To: VSAT CCT <vsat.cct@one.verizon.com>
Subject: search warrant

To whom this may concern. I have sent a pdf copy of a search warrant in regards to a Verizon Subscriber that is involved in a homicide case. We the White Oak, NC police Department would like the results of this warrant to be issued as soon as possible. Thank you for your consideration.
Detective Kelle Gallagher

37. On October 18, 2023, at 1:29 PM (unknown time zone), VSAT CCT received a communication from SUBJECT EMAIL ACCOUNT #3 stating the following:

Warrant
gallagher.kelley@proton.me <gallagher.kelley@proton.me> Wed, Oct 18, 2023 at 1:29 PM
To: "VSAT.CCT@ONE.Verizon.com" VSAT.CCT@one.verizon.com

This is Detective Kelle Gallagher of the White Oak Police Department, o have a search warrant pending with Verizon. VSAT Case Number 23492085-0 I'm in need of the information listed in this warrant soon. We believe that the subscriber is trying to flee the country to avoid prosecution.

Your help on getting us this data would be greatly appreciated. Thank you for your cooperation.

Also can you make sure all IP addresses are included in the data package.

Sent with Proton Mail secure email.

38. On October 18, 2023, around 6:45 PM (unknown time zone), VSAT CCT received a phone call from a subject who identified themselves as “Kelley Gallagher” from the “White Oak Police Department.” GLAUNER provided the callback number 505-234-4257. The caller requested a “rush” on the return of the search warrant due to the “suspect fleeing the country.” The caller advised that no target number was referred to in the legal document but referred to the name “[Mxxxxxxx, referring to Victim 1].”

39. The VSAT CCT at Verizon Wireless discovered that 505-234-4257 is a number assigned to a Wal-Mart Family Mobile account managed by Verizon Wireless. According to Verizon Wireless records, the subscriber is Tanya Armenta, of 1002 17th St, NW, Rio Rancho, New Mexico 87144.

40. On October 18, 2023, Cumberland County Superior Court Judge Gale M. Adams, whose name was used on the fictitious search warrants, was contacted by law enforcement. Judge Adams was shown a copy of the fictitious search warrant dated September 22, 2023. Judge Adams advised that she did not sign this document and that the signature was not hers.

41. On October 19, 2023, an employee of the Shoe Department Encore, located in Raleigh, North Carolina, where Victim 1 also worked and was present at

the time, received a phone call from an unknown caller looking to speak with Victim 1. Victim 1 used her mobile device to record the conversation between her coworker and the caller. The caller asked to speak with “Victim 1,” and the coworker indicated that nobody by the name was working at the store at that time. The caller became upset, accused the coworker of lying, and called the coworker a “prick” before disconnecting. RPD detectives reviewed the recording, and identified the unknown caller’s voice as the same as **GLAUNER** that called Verizon Wireless and Raleigh Wake Emergency Communications. The store continued to receive multiple calls from **GLAUNER** for several days, and the frequency of the calls interrupted the employees and the business.

42. A search was conducted through various law enforcement databases for the **TARGET NUMBER** and it was discovered that the service provider assigned the number is Bandwidth.com, meaning that the **TARGET NUMBER** is a VoIP (Voice over IP) number. On October 19, 2023, Bandwidth.com identified the number as being leased to Google, Inc. Google provides VoIP numbers through their Google Voice service. Google Voice is an Internet-based calling and texting service that can be used by mobile devices for free.

43. On October 23, 2023, probable cause was presented to Wake County Superior Court Judge Ridgeway, requesting the issuance of a search warrant for the Google account associated with the **TARGET NUMBER**. After reviewing the probable cause affidavit, Judge Ridgeway issued the search warrant authorizing the search of the Google account associated with the **TARGET NUMBER**.

44. On October 24, 2023, the search warrant was uploaded to Google's online legal portal as required.

45. On October 26, 2023, Victim 1 obtained a Tracphone with the assigned number XXX-XXX-0176, and provided the number to **GLAUNER** to prevent or reduce the calls and text messages to Victim 1's friends, family, and employer. **GLAUNER** started communicating with Victim 1 through the Tracfone number, and the calls and texts to Victim 1's friends and family members stopped or were greatly reduced.

46. On October 30, 2023, Google returned the search warrant results. Based on the information provided by Google, the Google Voice account associated with the TARGET NUMBER had logged into the service utilizing the following IP addresses:

- a. (67.0.93.204) at 2023-10-13, at 23:43:47 Z
- b. (67.0.93.204) at 2023-10-13, at 23:41:26 Z
- c. (67.0.93.204) at 2023-10-13, at 20:09:50 Z

47. Based on information gathered from ARIN.net, the IP address listed above was assigned to the internet service provider CenturyLink Communications, LLC, headquartered at 100 CenturyLink Dr., Monroe, LA 71201.

48. The "terms of service" IP address was listed as:

- a. (2607:fb90:3588:8d1b:7bd9:2012:5de:ee3f) at 2023-08-29, at 03:22:33 Z

49. Based on information gathered from ARIN.net, the IP address mentioned above was assigned to the internet service provider T-Mobile USA, Inc.,

headquartered at 12920 SE 38th Street, Bellevue, WA 98006. T-Mobile provides communications services for mobile devices for a fee, indicating that a mobile device was used to access the Google Voice account in the commission of these crimes.

50. On October 30, 2023, probable cause was presented to Wake County Superior Court Judge C. Croom, requesting the issuance of court orders for information regarding the IP addresses mentioned above. After reviewing the probable cause affidavit, Judge Croom issued the court order authorizing the disclosure of the IP addresses by the internet services providers.

51. On November 1, 2023, CenturyLink (now called LUMEN) responded to the order and provided the subscriber information for the internet access account assigned to the IP addresses mentioned above. According to LUMEN, the IP addresses were assigned to subscriber Tanya Armenta at the physical address of 1002 17th St NW, Rio Rancho, New Mexico 87144. This subscriber and address are the same as the mobile number listed as a callback number during **GLAUNER**'s communications with Verizon Wireless on October 18, 2023.

52. Utilizing various law enforcement databases, including Accurant and NCLinx, a subject identified as **GLAUNER** (DOB: XX/XX/1964) was associated with the above-referenced subscriber, Tanya Armenta. Utilizing DCI/NCIC, it was discovered that **GLAUNER** had claimed the same above-referenced address on his New Mexico driver's license.

53. In addition, it was learned that **GLAUNER** was listed in NCIC as wanted by the San Diego Sheriff's Office on a charge of Stalking. Inquiries revealed

that the NCIC entry was related to an arrest warrant issued by the Oceanside Police Department regarding a stalking case involving **GLAUNER**'s ex-girlfriend, Kelle Gallagher. Notably, several of the fictitious search warrants were issued by Officer "Kelle Gallagher."

54. On November 2, 2023, Investigators received copies of the case reports from the Oceanside Police Department involving the stalking case involving **GLAUNER**. The reports detail how **GLAUNER** called and texted Gallagher repeatedly and even called law enforcement to report fictitious crimes at Gallagher's address. One of the Oceanside Police reports documented that Gallagher had "changed her phone number 4 times in the last four months but somehow [**GLAUNER**] keeps getting her number."

55. On November 5, 2023, Victim 1 advised that she received communications from **GLAUNER** that he was on his way to North Carolina. He reported that he would arrive in Cary, North Carolina, around 11:00. Later that day, Victim 1 received a text message that contained the following excerpt:

I really can't F***** believe you did this to me again [Mxxxxx, referring to Victim 1] you f***** me with my gas the money I spent on gas to drive all the way to f***** Little Rock Arkansas and then tell me to turn around you f***** c*** that's right I'm venting right now because I don't know what else to do except maybe crash my f***** car into a tree and just f***** end it because of you or maybe I should just turn around head to your house and stop at a f***** Walmart or somewhere or I don't know Dick's sporting goods what else though the big five and pick me up a f***** rifle and come to your house how's that sound f***** it if I can't have either nobody can how does that sound [Mxxxxx, referring to Victim 1] are you getting scared now yeah I think that's what I'm going to do I'm just going to turn around stop at a big five and give me a f***** rifle and some ammunition and if

I can't have you no one can you want to treat me like this well
f*** you.

56. These statements put Victim 1 in fear for her life and her general safety. Victim 1 relayed information to law enforcement regarding GLAUNER's whereabouts as he traveled from New Mexico to Raleigh, North Carolina.

57. On November 6, 2023, probable cause was presented to a Wake County Magistrate Judge requesting the issuance of an arrest warrant charging GLAUNER with Extortion (for threatening to release Victim 1's nude images to family members), Stalking, Cyberstalking, and Communication of Threats. After reviewing the probable cause, Wake County Magistrate S. Jackson issued a warrant authorizing the arrest of GLAUNER.

58. Based on text messages and other information, GLAUNER appeared to be heading to [REDACTED], Raleigh, North Carolina, where he believes Victim 1 resides. Law Enforcement established surveillance on [REDACTED] while Victim 1 and her family left the residence for the evening. At approximately 9:00 PM, GLAUNER arrived driving a red Jeep Cherokee bearing the New Mexico license plate WAGL61. This vehicle is registered to Tanya Armenta of 1002 17th St NW, Rio Rancho, NM 87144. GLAUNER parked the Jeep on Maywood Ave., near Summit Ave., exited the vehicle, and walked towards [REDACTED]. GLAUNER appeared to be texting on a mobile device, and this was confirmed by Victim 1. GLAUNER stopped directly in front of [REDACTED] before entering the neighbor's yard and standing in a darkened area, at which time members of RPD arrested him. A search incident to arrest revealed that he had a black folding razor blade knife on his person

REMARKS
IN PARA. 58
AT
AFFIDAVIT
DIRECTION.
JL

and two mobile phone devices. One of these mobile phone devices displayed an image of Victim 1 as the lock screen, and the screen displayed a notification that a text message was received from "Victim 1."

59. **GLAUNER** was arrested and transported to the Wake County Jail, and the outstanding warrants were served. **GLAUNER** was also charged with being a Fugitive from Justice for the outstanding warrant from California. **GLAUNER** was given a \$550,000 bond.

60. On November 6, 2023, contact was made with Tanya Armenta, who indicated that she and **GLAUNER** had been involved in a romantic relationship. She further stated that **GLAUNER** was utilizing her vehicle. She believed that **GLAUNER** was in Oklahoma. Armenta indicated that her brother, Wayne Armenta, resides in Butner, North Carolina, and she would like Wayne to pick up the Jeep. Armenta suspected that **GLAUNER** was communicating with other women because **GLAUNER** acted distant and strange. Sometime before **GLAUNER**'s arrest, she took it upon herself to look through his phone and took photos of messages and other files on **GLAUNER**'s phone that confirmed her suspicions. Armenta agreed to send investigators the images she took of items on **GLAUNER**'s phone. The images were added to the RPD case file. The images showed that the device was communicating with Victim 1, and Victim 1's address was listed in a note stored on the phone.

61. On November 7, 2023, Investigators met with Wayne Armenta so he could pick up the Jeep. Wayne asked investigators to search the Jeep before he took

possession. Tanya Armenta was contacted by phone, and she verbally consented to search her Jeep.

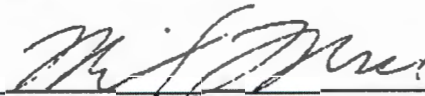
62. Upon searching the Jeep, investigators located a glass meth pipe and an Altoids-brand tin containing approximately eight grams of suspected methamphetamine in the same pocket of a tan Carhart jacket that Wayne positively identified as belonging to **GLAUNER**. In addition, two new bundles of rope (still in the plastic wrap) were discovered in a black backpack found in the Jeep's second-row seat. Photos were taken of the suspected methamphetamine and ropes and were added to the RPD case file. The suspected methamphetamine was confiscated and placed into evidence, but the ropes were left in the Jeep as they were not believed to be contraband. The suspected methamphetamine has since been submitted for lab testing.

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CONCLUSION

63. Based on the facts set forth in this affidavit, I submit that there is probable cause to believe that **Robert Michael GLAUNER** violated 18 U.S.C. § 2261A(1)(A)(i) (stalking), and 18 U.S.C. §§ 1039(a)(1), (a)(3), and (e)(1).

Respectfully Submitted,



MICHAEL NEYLON
Special Agent
Federal Bureau of Investigation

On this 11 day of December, 2023, at or around 2:33 ~~AM~~/PM, Special Agent Michael Neylon appeared before me via reliable electronic means (telephone), was placed under oath, and attested to the contents of this Affidavit.



JAMES E. GATES
United States Magistrate Judge